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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
THOMAS MAHONEY,
Defendant.

CASE NO. CR18-090 JCC
SUPERSEDING INFORMATION
(FELONY)

The United States Attorney charges that:

COUNT 1
(Travel with Intent to Engage in a Sexual Act with a Minor)

On or about November 29, 2016, in the Western District of Washington, and elsewhere, the defendant, THOMAS MAHONEY, did knowingly travel in interstate commerce, to wit from Seattle, Washington to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined by 18 U.S.C. § 2246, with a person under the age of eighteen, namely MV, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Sections 2423(b).

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1 **COUNT 2**

2 **(Travel with Intent to Engage in a Sexual Act with a Minor)**

3 On or about May 15, 2017, in the Western District of Washington, and elsewhere,
4 the defendant, THOMAS MAHONEY, did knowingly travel in interstate commerce, to
5 wit from Seattle, Washington to the State of California, for the purpose of engaging in
6 illicit sexual conduct, that is, a sexual act, as that term is defined by 18 U.S.C. § 2246,
7 with a person under the age of eighteen, namely MV, which sexual act would constitute a
8 violation of Title 18, United States Code, Chapter 109A.

9 All in violation of Title 18, United States Code, Sections 2423(b).

10 **COUNT 3**

11 **(Travel with Intent to Engage in a Sexual Act with a Minor)**

12 On or about August 31, 2017, in the Western District of Washington, and
13 elsewhere, the defendant, THOMAS MAHONEY, did knowingly travel in interstate
14 commerce, to wit from Seattle, Washington to the State of California, for the purpose of
15 engaging in illicit sexual conduct, that is, a sexual act, as that term is defined by 18
16 U.S.C. § 2246, with a person under the age of eighteen, namely MV, which sexual act
17 would constitute a violation of Title 18, United States Code, Chapter 109A.

18 All in violation of Title 18, United States Code, Sections 2423(b).

19 **COUNT 4**

20 **(Enticement of a Minor)**

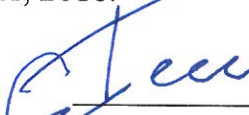
21 Between on or about July 1, 2016, and October 31, 2017, in Bellevue and Bothell,
22 within the Western District of Washington, and elsewhere, THOMAS MAHONEY used
23 a facility and means of interstate and foreign commerce, including the internet and a
24 cellular phone, to knowingly persuade, induce, entice, and coerce MV, an individual who
25 had not yet attained the age of 18 years, to engage in sexual activity for which a person
26 can be criminally charged, to include Production of Child Pornography in violation of 18
27 U.S.C. § 2251(a).

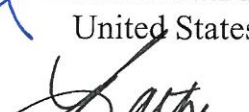
28 All in violation of Title 18, United States Code, Section 2422(b) and 2427.


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- a. Any and all images of child pornography, in whatever format and however stored;
- b. Lenovo Laptop;
- c. Dell Inspiron Laptop;
- d. Samsung Galaxy S7 Cell Phone; and
- e. Samsung Galaxy S8 Cell Phone.

September, 2018.


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United States Attorney


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